

PLACER COUNTY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit to Operate

Statement of Basis

Pursuant to Rule 507, the Placer County Air Pollution Control District (District) intends to issue the following proposed Title V Operating Permit.

Permit Number: F-000X

Effective: (Date)

Expiration: (Date)

District Contact: Todd Nishikawa

Issued to:

Formica Corporation

3500 Cincinnati Avenue

Rocklin, California 95677

Plant Location:

Sierra Plant

3500 Cincinnati Avenue

Rocklin, California 95677

Nature of Business: Laminate manufacturing

SIC Code: 3089

Responsible Official:

Vern Pilarsky

Plant Manager

(916) 645-3301

Facility Contact:

Ed Wojinski

Manager, Safety and Environmental Affairs

(916) 434-3019

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Attachment

Proposed Title V Operating Permit F-000X

Abbreviations/acronyms

Administrator - Administrator of the Environmental Protection Agency
Act -Clean Air Act
ARB - Air Resources Board
APCO - Air Pollution Control Officer
AP-42 - USEPA *Compilation of Emission Factors* document
ASTM - American Society for Testing and Materials
ATC - Authority to Construct permit
bhp - brake horsepower
BSFC- brake-specific fuel consumption
Btu - British thermal unit
CAA - Clean Air Act
CARB - California Air Resources Board
CAAA - Clean Air Act Amendments of 1990
CAM - Compliance Assured Monitoring
CAP - Clean Air Plan
CARB - California Air Resources Board
CEMS - continuous emissions monitoring system
CFR - Code of Federal Regulations
CO - carbon monoxide
CO2 carbon dioxide
Districts - Placer County Air Pollution Control District
dscf -dry standard cubic foot
Deg. F -degrees Fahrenheit
EPA - U. S. Environmental Protection Agency
ERC - emission reduction credit
Formica - Formica Corporation Sierra Plant
FR - Federal Register
g - gram
gal - gallon
gpm - gallons per minute
gr - grain
gr/acf - grains per actual cubic foot
gr/dscf- grains per dry standard cubic foot
HHV- higher heating value
H2S - hydrogen sulfide
H&SC- California Health and Safety Code
IC - internal combustion
I&M - inspection and maintenance
k - thousand
kV - kilovolt
lb - pound
lbs/hr - pounds per hour

LHV - lower heating value
MM, mm - million
MSDS - Material Safety Data Sheet
MW - molecular weight or Megawatts
NESHAP - National Emissions Standards for Hazardous Air Pollutants
NO_x - oxides of nitrogen (calculated as NO₂)
NSPS - New Source Performance Standards
O₂ - oxygen
OCS - Outer Continental Shelf
PCAPCD - Placer County Air Pollution Control District
PFD - process flow diagram
pH - hydrogen ion concentration in a solution
PSD - Prevention of Significant Deterioration
PTO - Permit to Operate
ppmv - parts per million volume (concentration)
psia - pounds per square inch absolute
psig - pounds per square inch gauge
PM - particulate matter
PM₁₀ - particulate matter less than 10 mm in size
PTE - potential to emit
ROC - reactive organic compounds
scf - standard cubic feet
scfd - standard cubic feet per day
scfm - standard cubic feet per minute
SCAQMD - South Coast Air Quality Management District
SIP - State Implementation Plan
SO_x - sulfur oxides
TOC - total organic compounds
tpq - tons per quarter
tpy - tons per year
unit - single emissions unit
USEPA - United States Environmental Protection Agency or EPA
VOC - volatile organic compounds
wt % - weight percent

1. Background

The Federal Clean Air Act Amendments of 1990 established the nation-wide permit program commonly known as "Title V." The Placer County Air Pollution Control District adopted Rule 507, Federal Operating Permit Program, to implement the federal program locally. The District received Interim Program Approval from the EPA on 12/8/94 (59 FR 63289 Interim Approval) and 5/3/95 (60 FR 21720 Interim Approval).

District Rule 507, Federal Operating Permits, established the procedures and requirements for issuing operating permits consistent with the requirements of Title V of the Clean Air Act, as amended in 1990, pursuant to Title 40 CFR Part 70.

As stipulated in Section 401.4.b. of District Rule 507, this document is the Statement of Basis that sets forth the legal and factual basis for the permit conditions which have been incorporated into the Title V permit to operate. The purpose of this statement is to enable interested parties to efficiently review the proposed permit and the decisions made by the District in drafting the permit. Specifically, this statement should enable reviewers to evaluate whether the permit contains conditions that accurately reflect the requirements of any underlying laws or regulations and whether the permit conditions are enforceable through monitoring, record keeping and reporting requirements.

2. Facility Description

The following is a description of Formica Corporation's operations and equipment at the Sierra Plant located on 3500 avenue in Rocklin, California.

A. Process Description

The Formica Sierra Plant manufactures high pressure laminates from paper and resins.

B. Equipment List

B.1. Combustion Emissions Units

Description	District Unit #
Boiler # 1 (natural gas-fired)	Form 76-02
Boiler #2 (wood waste/natural gas-fired) vented to Baghouse #4	Form 76-01
RTO	Form 94-01
Duct Heater	Form 94-01

B.2. Emissions Control Units

Description	District Unit #
Regenerative Thermal Oxidizer (RTO)	Form 94-01
Baghouse #1 North	Form 76-09
Baghouse #2 South	Form 76-09
Baghouse #3	Form 76-09
Baghouse #4	Form 76-01

B.3. Coatings and Solvent Emission Units

Description	District Unit #
Phenolic Treater Line #1	Form 76-05
Phenolic Treater Line #2	Form 76-06

Melamine Treater Line #3	Form 76-07(a)
Melamine Treater Line #4	Form 76-07(b)

B.4. General Emissions Units

Description	District Unit #
Laminated sheet trimming and sanding	Form 76-09
Laminated sheet trimming and sanding	Form 87-01
Stainless Steel Plate Refinishing system	Form 76-08

C. Exempt Equipment

C.1. Cooling Towers

Description	Basis
Cooling Tower	<10,000 gallon/minute

C.2. Drums

Description	Basis
Hexane and Naphtha	55 gallon drums
Oil and Kerosene	55 gallon drums

C.3. Fixed Tanks

Description	Basis
Diesel Fuel Tank	1000 gallon
Gasoline Fuel Tank	250 gallon
Melamine Tank #1	<2 lb. per day VOC
Melamine Tank #2	<2 lb. per day VOC
Phenolic Tank #1	<2 lb. per day VOC
Phenolic Tank #2	<2 lb. per day VOC

Phenolic Tank #3	10,000 gal (not in use)
Phenolic Tank #4	10,000 gal (not in use)

D. Insignificant Activities

The following types of activities are exempted from the Title V permit requirements based on EPA's guidelines of Trivial Activities.

1. Plant maintenance and upkeep activities, such as painting.
2. The repair and maintenance shop activities not related to the source's primary business activities.
3. Combustion emissions from propulsion of mobile sources.
4. Portable generators, portable steam cleaners, and water heaters/steam cleaners.
5. Unheated cleaning equipment and office janitorial activities and equipment and consumer use of janitorial products and consumer use of office equipment and products.

3. Applicability of District Rule 507

A. Source Emissions Summary

Formica reported the following potential VOC, NO_x, CO, SO_x, and PM₁₀ emissions in its Title V permit application.

Potential Emission in Tons Per Year				
VOC	NO _x	CO	SO _x	PM ₁₀
34.4	72.1	108.4	6.4	8.9

B. Rule 507 Emission Trigger levels

Sources subject to District Rule 507 include, major stationary sources, acid rain units subject to Title IV of the Federal Clean Air Act (CAA), solid waste incinerators subject to Section 111 or 129 of the CAA, and any other stationary sources specifically designated by rule of the U.S. Environmental Protection Agency (EPA).

For the purposes of District Rule 507, Section 219.2 defines a “major source” as any source with the potential to emit above the following emission levels:

1	10 tons per year, or more, of any hazardous air pollutant listed pursuant to Section 112(b) of the CAA or 25 tons per year, or more, of any combination of hazardous air pollutants listed or,
2	25 tons per year of nitrogen oxides or
3	25 tons per year of volatile organic compounds or,
4	100 tons per year of sulfur dioxide, or
5	100 tons per year of carbon monoxide, or
6	100 tons per year of PM ₁₀ , or
7	100 tons per year of a regulated air pollutant or
8	any lesser emission threshold quantity promulgated by the EPA.

Formica’s potential emissions are above the major source trigger levels for VOC, CO, and NO_x.

4. Applicable Requirements

District Rule 507 Section 303.1.e, requires each source subject to the requirements of this rule to submit a permit application and to identify all applicable conditions and requirements originating from the following orders, rules, regulations and laws:

A. Provisions of Division 26 of the California Health and Safety Code, commencing with Section 39000;

The provisions of Division 26 of the Health & Safety Code address protection of air quality in California. Several sections of Division 26 apply to Formica. Applicable requirements include administrative permit requirements, the state's opacity standard, and requirements of the Air Toxics Hot Spots reporting program. These requirements are currently and will continue to be enforced by the District.

B. All applicable orders, rules, and regulations of the District and the California Air Resources Board (ARB);

The regulations of the California Air Resources Board are codified in the California Code of Regulations under Title 13 and Title 17. Title 13 specifies standards which apply to mobile sources of emissions and would not apply to the Formica facility. Title 17 specifies standards which apply to stationary sources of emissions and several sections may apply to the Formica facility. Title 17 requirements include standard source test methods and requirements on abrasive blasting operations. These requirements, if applicable, will be enforced by the District.

District orders, rules, and regulations are reflected in the District's rules and District issued permits. Several rule and permit requirements are currently and will continue to be enforced by the District.

C. All applicable provisions of the implementation plan required by the Federal Clean Air Act;

In California, the provisions of the implementation plan required by the Federal Clean Air Act are contained in the state implementation plan (SIP). The SIP is the state's plan for improving or maintaining air quality and complying with this federal requirement.

The Federal Clean Air Act requires states to submit the SIP to EPA for its review and approval. In California the local air pollution control agencies have jurisdiction over stationary sources of emissions. The SIP contains the local air permitting authority rules and regulations necessary to implement the programs mandated by Federal law.

Once EPA adopts the plan or parts of it, the plan and the requirements contained in the plan become "federally enforceable" by the EPA. Local rules adopted into the SIP are federally enforceable. However, new or modified local rules are not federally enforceable until they are

approved and adopted into the SIP by the EPA.

D. Each applicable emission standard or limitation, rule, regulation, or requirement adopted or promulgated to implement the Federal Clean Air Act; and

These standards are found in several sections of Title 40 of the Code of Federal Regulations. Section 205 of District Rule 507 specifically identifies the regulations that must be evaluated for applicable standards and requirements.

E. The requirements of all preconstruction permits issued pursuant to Parts C and D of the Federal Clean Air Act.

Part C of the Federal Clean Air Act addresses Prevention of Significant Deterioration (PSD) of air quality for areas in attainment of federal air quality standards. Part D of the Act addresses requirements for areas not in attainment of federal air quality standards.

Preconstruction requirements pursuant to Part C, are contained in Federal PSD permits issued by EPA. Preconstruction requirements issued pursuant to Part D, are reflected by conditions contained in NSR permits issued by the District.

Formica has not been issued a PSD permit by EPA but has been issued several District permits pursuant to District Rule 501, General Permit Requirements, Rule 502, New Source Review, and Rule 504, Emissions Reduction Credits.

Current Placer county Federal Air Quality Designations found in 40 CFR § 81.305, are as follows:

TSP	Better than National Standard
SO ₂	Can not be Classified
CO	Attainment
Ozone	Nonattainment
PM ₁₀	Unclassifiable
NO ₂	Cannot be classified or better than national standards

[43 FR 8964, Mar. 3, 1978]

Note: EPA has replaced the total suspended particulate (TSP) ambient air quality standard with the PM₁₀ standard. TSP is no longer a relevant ambient air quality standard.

5. Permit Development

A. Specific Terms and Conditions Required by Section 402.2 of Rule 507

District Rule 507 Section 402.2 requires specific terms and conditions that must be incorporated into District Title V permits to be consistent with the requirements of 40 CFR Part 70.6 (Permit Content). These terms and conditions include the following:

1. Federal Emission and Operational Limitations

All emissions limits as well as operating conditions identified for the Formica facility had been incorporated into Section 2, Unit Specific Conditions, of the proposed Title V permit to operate.

2. Preconstruction Permit Requirements

A review of all preconstruction (Authority to Construct) and operating permits has been performed. Conditions have been grouped into three categories, obsolete conditions, conditions streamlined by conditions incorporated into the proposed permit, and conditions incorporated into the proposed Title V permit to operate.

3. Origin and Authority for Permit Conditions

The origin and authority of each term or condition contained in the proposed Title V permit to operate have been identified and stated for each term or condition.

4. Equipment Identification

A description of the facility and a listing of equipment to which the terms and conditions apply are contained in Section 1 (Facility Description and Equipment Lists) of the proposed Title V permit to operate.

5. Monitoring, Testing, and Analysis

Monitoring, testing, and analysis requirements have been incorporated into the terms and conditions found in Section 6 of the proposed Title V permit to operate.

6. Record Keeping

Record keeping requirements have been incorporated into the conditions contained in Section 6 of the proposed Title V permit to operate.

7. Reporting

Reporting requirements have been incorporated into Section 6 (Monitoring, Testing, and Record Keeping) of the proposed Title V permit to operate.

8. Compliance Plan

A condition requiring Formica to follow the compliance plan submitted in its initial Title V permit application has been incorporated into Section 7 (Compliance Certification) of the proposed Title V permit to operate. A copy of the compliance plan submitted with the initial permit application is attached to the proposed Title V permit to operate.

9. Compliance Schedule

All emission units operated by Formica at the Sierra Plant are currently in compliance. A compliance schedule has not been incorporated into the proposed Title V permit to operate.

10. Right of Entry

A condition requiring Formica to allow District, ARB, or U.S. Environmental Protection Agency officials entry for the purpose of inspecting and sampling has been incorporated into Section 4 (Standard Terms and Conditions) of the proposed permit.

11. Compliance with Permit Conditions

Provisions regarding compliance with all terms and conditions have been incorporated in Section 3 and Section 4 of the proposed Title V permit to operate.

12. Emergency Provisions

Emergency provisions have been incorporated in Section 4 (Standard Terms and Conditions, condition 4.K) of the proposed Title V permit to operate.

13. Severability

A severability clause to ensure the continued validity of otherwise unaffected permit requirements has been incorporated in Section 4 (Standard Terms and Conditions, condition 4.D) of the proposed permit.

14. Compliance Certification

A compliance certification requirement has been incorporated into Section 7 (Compliance Certification) of the proposed Title V permit to operate.

15. Permit Life

A fixed term of 5 (five) years has been incorporated into Section 4 (Standard Terms and Conditions, condition 4.A) of the proposed permit.

16. Payment of Fees

Conditions to ensure that appropriate permit fees are paid on schedule have been incorporated into Section 4 (Standard Terms and Conditions, condition 4.B) and Section 8 (Supplemental Fees) of the proposed Title V permit to operate.

17. Alternative Operating Scenarios

The alternative operating scenario requested by the responsible official has been incorporated into Section 5 (Alternative Scenarios) of the proposed Title V permit to operate.

18. Voluntary Emissions Caps/Emissions Netting

Provisions for emissions caps/emissions netting have been incorporated into Section 4 (Standard Terms and Conditions) of the proposed Title V permit to operate.

19. Acid Rain Units Subject to Title IV

These requirements do not apply to Formica and have not been incorporated into the proposed Title V permit to operate.

20. Portable/Temporary Sources

Formica does not operate portable or temporary sources. These requirements do not apply to Formica and have not been included in the proposed Title V permit to operate.

B. Incorporation of Applicable Federal Requirements as Conditions

Rule 507 requires specific procedures to follow to ensure that each permit issued pursuant to this rule contains the terms and conditions that will adequately ensure compliance with all applicable federal requirements.

Section 402.1 of District Rule 507 prescribes the procedure that is to be used to incorporate applicable federal requirements into Title V permit conditions. The following steps are to be taken when developing a Title V permit.

1. Permit conditions which addressed non-federally enforceable requirements are to be distinguished from conditions which addressed federal requirements by labeling such conditions as “District Only”;

2. When a federal requirement and similar non-federally enforceable requirement apply to the same emissions unit, both requirements must be incorporated as permit conditions; and

3. When a federal requirement and a similar non-federally enforceable requirement apply to the same emissions unit and the requirements are mutually exclusive, the requirement specified in the preconstruction permit or the more stringent requirement is to be incorporated as the Title V permit condition and the other requirement referenced in the Title V permit.

These procedures have been followed in developing the proposed Title V permit to operate.

6. Reviews for Applicable Requirement

Section 302.1 of District Rule 507 requires all Title V permits to operate incorporate conditions sufficient to ensure compliance with all applicable requirements. The following rules and regulations have been reviewed for applicable requirements.

A. Division 26 of the California Health and Safety Code.

With the exception of administrative requirements, most requirements contained in Division 26 of the California Health and Safety Code are reflected in or have been incorporated into District rules. For example, requirements for preconstruction permits, opacity limits, and “Air Toxics Hotspots” reporting are all required by District rules and reflected in District permit conditions.

B. District SIP Adopted Rules

District rules adopted into the state implementation plan (SIP) have been reviewed for applicable requirements. The results of this review are summarized in **Table 1 SIP Rules**.

C. District Non SIP Adopted Rules

District rules not adopted into the SIP have also been reviewed for applicable requirements. The results of this review are summarized in **Table 2 Non-SIP Rules**. Requirements incorporated into the proposed Title V permit to operate originating from Non -SIP rules have been designated “**District Only**”.

D. Preconstruction Permit Requirements from Authority to Construct/ Permits to Operate

All Prevention of Significant Deterioration (PSD) permits, Authorities to Construct (ATC) and Permits to Operate (PTO) have been reviewed for federally enforceable preconstruction conditions. Terms and conditions from Formica's preconstruction permits and permits to operate were grouped into three categories, obsolete conditions, conditions streamlined by conditions incorporated into the proposed permit, and the conditions incorporated into the proposed permit to operate. The results of these reviews are summarized in **Table 3 - Incorporated Conditions**, **Table 4 - Streamlined Conditions**, and **Table 5 - Obsolete Conditions**.

E. Federal Emissions and Operational Limitations

Titles I, III, IV, and VI of Federal Clean Air Act and Section 504(b) of the Federal Clean Air Act have been reviewed for applicable requirements defined in Section 205 of District Rule 507. The results of the Federal Emissions and operational limitations review are presented in **Table 6 Summary of Applicable Federal Requirements**.

Table 1
Formica Corporation
District SIP Rules

Rule#	Title	Applicable	Basis	In Compliance	Condition
Regulation 1-General Provisions					
<u>101</u>	Title	Y	Administrative requirement	Y	N
<u>102</u>	Definitions	Y	Administrative requirement	Y	N
<u>103</u>	Validity	Y	Administrative requirement	Y	N
Regulation 2-Prohibitions					
<u>201</u>	Coverage	Y	Administrative requirement	Y	N
<u>202</u>	Visible Emissions	Y	Opacity limit	Y	3.A.
<u>203</u>	Exception to Rule 202	N	Not exempt from visible emission limits	N/A	N/A
<u>204</u>	Wet Plumes	Y	Administrative requirement	Y	N
<u>210</u>	Specific Contaminants	Y	.1 gr./dscf PM	Y	3.C.2. and 3.D.
<u>211</u>	Process Weight	Y	Administrative requirement	Y	3.E
<u>216</u>	Organic Solvent Cleaning and Degreasing Operations	N	Not a degreasing operation as defined in section 202	N/A	N/A
<u>217</u>	Cutback and Emulsified Asphalt Paving Materials	N	Minor paving operation, insignificant	N/A	N/A
<u>219</u>	Organic Solvents	Y	Plate cleaning operation	Y	6.C.5.
<u>220</u>	Abrasive Blasting	N	Not a an abrasive blasting operation	N/A	N/A

221	Compliance Tests	Y	Compliance tests are required by permit	Y	6.E.1.
Regulation 3-Open Burning					
	Open Burning	N/A	None in SIP	N/A	N/A
Regulation 4-Miscellaneous Provisions					
406	Combination of Emissions	Y	Administrative requirement	Y	N
407	Circumvention	Y	Administrative requirement	Y	N
408	Source Record Keeping and Reporting	Y	Administrative requirement	Y	6.A.4.
Regulation 5-Permits -Current District rules are not adopted into the SIP. However, EPA considers Non-SIP rules that replace rule previously adopted into the SIP as federally enforceable.					
Regulation 6-Fees - Not considered federally applicable requirements					
Regulation 7- Hearing Board - Not considered federally applicable requirements					
Regulation 8-Enforcement - Not considered federally applicable requirements					
Regulation 9-Air Toxic Contaminants - None currently in SIP					

Table 2
Formica Corporation
District Non-SIP Rules

Rule#	Title	Applicable	Basis	Compliance	Condition#
Regulation 1-General Provisions					
	N/A	Y	All in SIP	Y	N
Regulation 2-Prohibitions					
205	Nuisance	Y	Odors, fugitive dust	Y	3.B.
206	Incinerator Burning	N	Does not operate an incinerator	N/A	N/A
207	Particulate Matter	Y	Administrative requirement	Y	3.C.
216	Organic Solvent Cleaning and Degreasing	N	parts cleaner exempt	N/A	N/A
218	Architectural Coatings	Y	Maintenance operations insignificant	Y	N
224	Aggregate Containing Asbestos	Y	Insignificant source	Y	N
229	Fiberboard Manufacturing	N	Does not manufacture fiberboard	N/A	N/A
231	Industrial, Institutional, and Commercial Boilers	Y	Boiler #1	Y	2.B.6. and 6.C.6.
240	Surface Cleaning and Degreasing	N	Does not degrease or clean surfaces	N/A	N/A
241	Boilers at Plastic Laminate Manufacturing Facilities	Y	Boiler #2	Y	2.A.
Regulation 3-Open Burning					
301	Prohibition on Open Burning	N	Does not open burn	N/A	N/A

Rule#	Title	Applicable	Basis	Compliance	Condition#
302	Burning Permits	N	Does not open burn	N/A	N/A
304	Permit Validity	N	Does not open burn	N/A	N/A
305	No Burn Days	N	Does not open burn	N/A	N/A
311	Wind Direction	N	Does not open burn	N/A	N/A
314	Preparation of Material to Be Burned	N	Does not open burn	N/A	N/A
321	Hazard Reduction Burning	N	Does not open burn	N/A	N/A
323	Open Burning Nonindustrial Woodwaste at Disposal Sites	N	Does not open burn	N/A	N/A
325	Recreational Open Fires	N	Does not open burn	N/A	N/A
Regulation 4-Miscellaneous Provisions					
401	Responsibility	Y	Issued a permit	Y	N
402	Authority to Inspect	Y	Administrative requirement	Y	N
403	Responsibility of Permittee	Y	Administrative requirement	Y	N
404	Upset Conditions, Breakdown, or Scheduled Maintenance	Y	Operates subject sources and control equipment	Y	3.F.
405	Separation of Emissions	Y	Administrative requirement	Y	N
409	Public Records	Y	Administrative requirement	Y	N
Regulation 5-Permits					
501	General Permit Requirements	Y	Subject to District permit	Y	3.G.

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Rule#	Title	Applicable	Basis	Compliance	Condition#
			requirements		
502	New Source Review	Y	NSR permit conditions	Y	Several Conditions
503	Emission Statement	Y	Potential emissions > 10 TPY	Y	3.H.
504	Emission Reduction Credits	Y	Issued ERCs	Y	3.I.
507	Federal Operating Permit Program	Y	Major NOx, VOC, CO source	Y	3.G.6. and sections 4, 5, 6, 7 and 8
511	Potential to Emit	N	Subject to Rule 507, sec. 104 exempts	N/A	N/A
512	Request for Synthetic Minor Source Status	Y	Not requesting synthetic minor source status	Y	N
Regulation 6-Fees					
601	Permit Fees	Y	Administrative requirement	Y	N
602	Hearing Board Fees	Y	Administrative requirement	Y	N
603	Analysis Fee	Y	Administrative requirement	Y	N
604	Source Test Observation and Report Evaluation	Y	Administrative requirement	Y	N
607	Burning Permit Fees	N	Does not open burn	N/A	N/A
608	Control Council Fee	Y	Administrative requirement	Y	N
610	Air Toxics "Hot Spots" Fees	Y	Subject to 2588 reporting	Y	3.G.4.
Regulation 7-Procedure before the Hearing Board					
701	General	Y	Administrative	Y	N

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Rule#	Title	Applicable	Basis	Compliance	Condition#
			requirement		
702	Filing Petitions	Y	Administrative requirement	Y	N
703	Contents of Petition	Y	Administrative requirement	Y	N
704	Petitions for Variances	Y	Administrative requirement	Y	N
705	Appeal from Denial	Y	Administrative requirement	Y	N
706	Failure to Comply with Rules	Y	Administrative requirement	Y	N
707	Answers	Y	Administrative requirement	Y	N
708	Dismissal of Petition	Y	Administrative requirement	Y	N
709	Place of Hearing	Y	Administrative requirement	Y	N
710	Notice of Hearing	Y	Administrative requirement	Y	N
711	Evidence	Y	Administrative requirement	Y	N
712	Preliminary Matters	Y	Administrative requirement	Y	N
713	Official Notice	Y	Administrative requirement	Y	N
714	Continuances	Y	Administrative requirement	Y	N
715	Decision	Y	Administrative requirement	Y	N
716	Effective Date of Decision	Y	Administrative requirement	Y	N
717	Lack of Permit	Y	Administrative requirement	Y	N
Regulation 8-Enforcement					
801	Enforcement	Y	Administrative requirement	Y	N

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Rule#	Title	Applicable	Basis	Compliance	Condition#
802	Authority to Arrest	Y	Administrative requirement	Y	N
803	Penalties	Y	Administrative requirement	Y	N
804	Order for Abatement	Y	Administrative requirement	Y	N
805	Notice to Comply	Y	Administrative requirement	Y	N
806	Civil Penalties	Y	Administrative requirement	Y	N
Regulation 9-Air Toxic Contaminants					
901	ATC Measure Benzene	N	Not a source of Benzene	N/A	N/A
902	ATC Measure Chromium	N	Not a plating operation	N/A	N/A
903	ATC Measure Ethylene Oxide	N	Not a source of Ethylene Oxide	N/A	N/A
904	ATC Measure-Hex Chromium from Cooling Towers	N	Cooling towers exempt	N/A	N/A
905	ATC Measure Asbestos	N	Not a significant source of asbestos	N/A	N/A

Table 3
Formica Corporation
Incorporated Conditions

Origin	Unit	Condition	TV Condition #
92-27 8	Phenolic Treater Lines and RTO	8. The District may require, upon reasonable written notice, that Formica Corporation conduct such emissions testing or analysis as may be deemed necessary by the District to demonstrate compliance with District Rules and Regulations and the limiting conditions of this permit.	6.D.
92-27 11c	Facility	11. Emissions Limitations: C. In accordance with District Rule 210, Specific Contaminants, particulate matter shall not exceed 0.1 gr/dscf at standard conditions.	3.C.2.
92-27 11d	Facility	11. Emissions Limitations: D. The emission of sulfur compounds, calculated as sulfur dioxide, shall not exceed 0.2 percent by volume, per Rule 210, Specific Contaminants.	3.D.
92-27 11k	RTO	11. Emissions Limitations: K. Compliance with hourly limitations shall be based on a three-hour average.	3.G.7.
92-27 12	Phenolic Treater Lines	12. The schedule of operations for Phenolic Treaters #1 and #2, and the thermal oxidizer shall not exceed 24 hours per day, nor 7 days per week, nor 52 weeks per year, without prior notice being made to the Air Pollution Control Officer and receipt of his authorization.	2.B.3.c.
92-27 15	RTO	15. The thermal oxidizer shall have an overall hydrocarbon destruction efficiency of no less than 98.5 % by weight.	2.B.4.d.
92-27 18	RTO	18. A continuous recording device shall be installed on the thermal oxidizer indicating the combustion chamber temperature	6.B.1.b.
92-27 19	Phenolic Treater Lines	19. The process rate shall be monitored in real time in such a way that the rate of resin usage can be determined continuously.	6.B.3.
92-27 20	Phenolic Treater Lines	20. A daily log indicating the amount and type of resin applied shall be maintained and made available for District inspection upon request.	6.C.3.
92-27 21	RTO	21. Records from monitoring equipment and required logs shall be kept by the Owner or Operator for a period of two (2) years, and shall be made available for District inspection upon request.	6.G.1.a.
92-27 22	Phenolic Treater Lines and RTO	22. Monitoring system information, including process monitors used for emissions estimation, shall be submitted to the District on an annual basis.	6.F.2.
92-27 25	Phenolic Treater Lines	25. No more than 48,000 pounds of resin per day shall be used in either Phenolic Treater, and no more than 96,000	2.B.3.c.

Origin	Unit	Condition	TV Condition #
		pounds of resin shall be used by both treaters combined in any one day. For the purposes of these conditions, unless otherwise stated, a "year" is any 12 contiguous months and a "day" is any calendar day.	
92-27 29	Phenolic Treater Lines and RTO	29. Source testing shall be conducted using the methods and procedures approved by the District. A pretest plan outlining the test methods and procedures shall be submitted for District approval at least 30 days prior to each test. Except as otherwise specified in District Rules and Regulations, testing methods for determining compliance with emission limits shall be: A. The appropriate methods adopted by the California Air Resources Board and cited in Title 17, California Code of Regulations, Division 3, Subchapter 8, Compliance with Non-vehicular Emission Standards; or B. The appropriate methods of 40 CFR part 50, Appendix M, Recommended Test Methods for State Implementation Plans; or C. Any appropriate method of 40 CFR part 60, Appendix A, Test Methods; or D. An alternative method following review and approval of that method by the Air Pollution Control Officer. Note: The Air Pollution Control Officer shall request the review of the alternate test methods by the U.S. Environmental Protection	6.E.1.
95-20 16	Duct Heater	16. Source testing to demonstrate a thermal oxidizer volatile organic compound control efficiency of no less than 98.5 % , an emission rate of no more than 7 pounds VOC per hour and 168 pounds VOC per day, shall be conducted annually, and whenever a resin other than those allowed by this permit is to be used. Source testing will be performed, and compliance with the hourly limit will be based, on three, consecutive one-hour test runs. Compliance with the daily emission limit will be based on the average hourly emission rate of the three one-hour test runs, multiplied by 24 (hours/day).	2.A.4.
95-20 17	Duct Heater	17. Source testing shall be conducted using the methods and procedures approved by the District. Unless otherwise authorized in writing by the District, the methods shall be those used in establishing initial thermal oxidizer compliance under Authority to Construct 92-27.	6.D.3.
95-20 21c	Duct Heater	21. Emissions Limitations: C. Air pollutant emissions from the heating unit may not exceed the following rates without the prior authorization of the Air Pollution Control Officer: 1) Particulate Matter: 0.3 pounds/day 2) Oxides of Nitrogen: 9.0 pounds/day 3) Carbon Monoxide: 1.3 pounds/day 4) Sulfur Oxides : 0.1 pounds/day 5) Non-methane Hydrocarbon: 0.5 pounds/day	2.A.2.
96-59 10	RTO	10. Source Testing a. Source testing to demonstrate a	6.D.1.

Origin	Unit	Condition	TV Condition #
		thermal oxidizer volatile organic compound control efficiency of no less than 98.5%, an emission rate of no more than 7 pounds VOC per hour and 168 pounds VOC per day, shall be conducted annually, and whenever a resin other than those allowed by this permit is to be used. Source testing will be performed, and compliance with the hourly limit will be based, on three, consecutive one-hour test runs. Compliance with the daily emission limit will be based on the average hourly emission rate of the three one-hour test runs, multiplied by 24 (hours/day). b. The next annual source testing following installation of the replacement burners shall determine emissions rates of carbon monoxide and nitrogen oxides. c. Source testing shall be conducted using the methods and procedures approved by the District. A pretest plan outlining the test methods and procedures shall be submitted for District approval at least 30 days prior to each test.	
96-59 11	RTO	11. Record keeping and Reporting. A log book or other record detailing the performance and date of preventive maintenance of the , corrective maintenance, and inspections, as well as reporting breakdowns (per District Rule 404), shall be established and maintained for the RTO. A record of the hours of operation and natural gas usage throughput shall be made and kept on site for at least two years. This information must be available to the District upon request.	6.C.1.
99-06 4	Facility	4. Pursuant to District Rule 502, New Source Review, Section 227, the plant manager shall report to the District immediately any changes in production rates or operation schedules, changes in operation methods or fuel characteristics, the addition to or removal of permitted equipment, and changes of any facilities or systems installed or used to achieve compliance with the District Rules and Regulations in addition to the terms and conditions of this Permit to Operate.	6.F.3.
99-06 5	Boiler #2	5. Revisions of this permit may be requested pursuant to District Rule 501, General Permit Requirements, Section 400.	3.G.6. and 4.F.
99-06 7	Facility	7. Upon any change in control or ownership of facilities constructed, operated, or modified under authority of this permit, the requirements contained in this Permit to Operate shall be binding on all subsequent owners and operators.	3.G.5.
99-06 9	Boiler #2	9. The flue gas recirculation system shall be maintained and operating whenever Boiler #2 is operated.	2.B.7.
99-06 10b	Boiler #2	10. Operation and Maintenance Plan An Operation and Maintenance Plan shall be submitted to the District by	6.H.1.a.

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Origin	Unit	Condition	TV Condition #
		September 30, 1999. The plan shall specify: A. Operation and maintenance procedures that will demonstrate continuous operation of the emission control system during emission-producing operations. This plan should indicate acceptable settings for the flue gas recirculation valves. B. Records that must be kept to document the operation and maintenance procedures	
99-06 11B	Boiler #2	11. Performance Test Requirements: B. Compliance source testing is required on an annual basis for sources subject to Rule 507, Federal Operating Permit Program.	6.D.2.a.
99-06 11B	Boiler #2	11. Performance Test Requirements: C. All. source tests shall be made in the as-found operating condition, except that source tests shall include at least one test conducted at the maximum feasible firing rate allowed by the District permit. No source test shall be conducted within two hours after a continuous period in which fuel flow to the unit is zero, or shut off, for thirty minutes or longer.	6.E.3.
99-06 11D	Boiler #2	11. Performance Test Requirements: D. The compliance tests shall be conducted for Nitrogen Oxides (NOx), Carbon Monoxide (CO), Carbon Dioxide (CO2), and Oxygen (O2) using the following test methods: 1. Nitrogen Oxides (NOX): ARB Test Method 100, Title 17, CCR, Section 94114, Procedures for Continuous Emission Stack Sampling, or EPA Test Method 7E, 40 CFR 60, Appendix A. 2. Carbon Monoxide (CO): ARB Test Method 10, Title 17, CCR, Section 94109, Determination of Carbon Monoxide Emissions from Stationary Sources, or ARB Test Method 100, or EPA Test Method 10, 40 CFR 60, Appendix A. 3. Oxygen (O2): ARB Test Method 100, Title 17, CCR, Section 94114, Procedures for Continuous Emission Stack Sampling, or EPA Test Method 3A, 40 CFR 60, Appendix A. 4. Carbon Dioxide (CO2): ARB Test Method 100, Title 17, CCR, Section 94114, Procedures for Continuous Emission Stack Sampling , or EPA Test Method 3A, 40 CFR 60, Appendix A.	6.D.2.b.
99-06 11E	Boiler #2	11. Performance Test Requirements: E. At least thirty (30) days prior to the compliance source tests, a written test plan detailing the test methods and procedures to be used shall be submitted for approval by the Air Pollution Control Officer. The plan shall cite the test methods to be used for the determination of compliance with the emission limitations of this rule. The plan shall provide the proposed procedures for the characterization of the waste materials to be burned during testing.	6.E.2.
99-06 11F	Boiler #2	11. Performance Test Requirements: F. A report of the compliance test shall be submitted to the District within sixty	6.E.4.

Origin	Unit	Condition	TV Condition #
		(60) days of completion of the source test.	
99-06 12	Boiler #2	12. Record keeping, and Reporting The following records are required for Boiler #2. These may be either logs or charts. An annual summary of information shall be provided to the District upon request. Records must be kept for five years. A. Days and hours of operation. B. Boiler steam load C. Fuel types, including gaseous, liquid, or solid fuels, and amounts on a monthly basis. D. Duration of startups and shutdowns E. Type and duration of maintenance and repairs F. Results of compliance tests	6.C.2.
99-06 13c	Boiler #2	13. Emission Limitations C. When Boiler #2- is fired on waste material and natural gas, the discharge of NOX emissions shall not exceed the following limitations, whichever is less stringent: 1. An exhaust concentration of 150 parts per million by volume (ppmv) referenced at dry stack-gas conditions and 3.00 percent by volume stack-gas oxygen on a three-hour average basis. 2. An exhaust emission rate of 15.5 pounds per hour on a three-hour average basis.	2.A.1.a.
99-06 13d	Boiler #2	13. Emission Limitations D. When Boiler #2 is fired natural gas only, the discharge of NOX emissions shall not exceed 1. An exhaust concentration of 50 ppmv referenced at dry stack-gas conditions and 3.00 percent by volume stack-gas oxygen on a three-hour average basis. 2. An exhaust emission rate of 5.2 pounds per hour on a three-hour average basis.	2.A.1.a.
99-06 13e	Boiler #2	13. Emission Limitations E. No person shall allow the discharge of carbon monoxide (CO) emissions from units subject to this rule in excess of 400 ppmv referenced at dry stack-gas conditions and 3.00 percent by volume stack-gas oxygen, on a three-hour average basis.	2.A.1.a.
99-06 13f	Boiler #2	13. Emission Limitations F. The maximum quarterly emissions from Boiler #2 shall not exceed: QUARTERLY EMISSION LIMITATIONS POLLUTANT POUNDS/QUARTER Nitrogen Oxides (NOX) 34,224 Carbon Monoxide (CO) 56,966	2.A.1.c.
PTO 1	Facility	1. In the event of any violation of District Rules and Regulations plant manager shall cease operation of violating equipment and take action to end such violation; except as provided for by District Rule 404.	3.F.2.
PTO 2	Facility	2. The plant manager shall notify the District (per Rule 404) of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by the District Rules and Regulations.	3.F.1.

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Origin	Unit	Condition	TV Condition #
PTO 3	Facility	3. Operation of this equipment must be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.	3.G.10.
PTO 6	Facility	6. The plant manager shall develop a maintenance program for equipment listed herein to preclude a violation of the California Health and Safety Code and District Rules and Regulations.	3.G.8.
PTO 7	Facility	7. A log book or other record detailing the performance and date of preventive maintenance, corrective maintenance, and inspections, as well as reporting breakdowns (per District Rule 404), shall be established and maintained. This log or record shall be made available to the District's inspector upon request.	6.C.4.
PTO 8	Facility	8. An Authority to Construct application shall be filed with the District prior to the modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required pursuant to Health and Safety Code, Section 42300, and District Rule 501, Permits Required.	3.G.1.
PTO 9	Facility	9. Compliance of the permitted facility is required with the provisions of the "Air Toxics 'Hot Spots' Information and Assessment Act" of 1987 (Health and Safety Code Sections 44300 et seq.).	3.G.4.
PTO 11	Baghouses Form 76-01, 76-09 & 87-01, 76-08	11. FORM-76-01, 76-09 & 87-01, 76-08: Spare bags shall be kept available for the replacement of torn or otherwise defective bags. Replacement bags shall be made available for District inspection.	2.B.1
PTO 12	Baghouses Form-76-01, 87-01	12. FORM-76-01, 87-01: Collected particulate matter shall be handled in a manner which prevents re-entrainment of the material into the ambient air. No collected particulate matter shall be outside of the collection bin.	2.B.2.
PTO 14	Facility	14. The equipment must be properly maintained and kept in good operating conditions at all times.	3.G.3.
PTO 15	Facility	15. The permit(s) do not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, of the Health and Safety Code of the State of California or the Rules and Regulations of the Air Pollution Control District. The permit(s) cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other governmental agencies.	3.G.9.
PTO 16	RTO	16. Phenolic Treater and Thermal Oxidizer total volatile	2.A.3.

Table 3 - Formica - Page 29 of 49

Origin	Unit	Condition	TV Condition #
		organic compound (VOC) emissions shall not exceed 15,120 lbs January through March (1 st quarter); 15,288 lbs April through June (2nd quarter); 15,456 lbs July through September (3rd quarter); and 15,456 lbs October through December (4th quarter).	
PTO 18	Phenolic Treater Lines	18. The phenolic treaters shall at no time be operated unless the thermal oxidizer is fully operational or in accordance with Rule 404, Upset Conditions. Breakdown or Scheduled Maintenance, or a variance granted by the District Hearing Board.	2.B.3.b.
PTO 19	Facility	19. The exceeding of an emission limitation shall be reported to the District immediately. The District may require a user within the District of offsets which are dependent upon compliance with the emission limit(s) for permanency, to obtain valid offsets or curtail operations to the extent that the credited reductions used as offsets are deemed to be no longer valid, pursuant to Rule 502, New Source Review.	6.F.1.a.
PTO 20	RTO	20. The thermal oxidizer temperature shall be maintained at a minimum level necessary to ensure that the specified minimum destruction efficiency is achieved, at all times during operations of either treater.	2.B.4.b.
PTO 21	RTO	21. Formica Corporation shall conduct operations and monitoring in accordance with the Operating Compliance Plan, to assure that the design characteristics or equipment will be properly maintained (or that the operational conditions will be properly performed) so as to continuously achieve the minimum degree of VOC control of 98.5 percent. Formica Corporation shall amend the Operating Compliance Plan to reflect and changes in operations, maintenance, or monitoring affecting the Operations Compliance Plan. These amendments shall be subject to District approval.	6.H.1.b.
PTO 22	Phenolic Treater Lines	22. Unless demonstrated by testing or an engineering evaluation to emit lower or equal quantities of volatile organic compounds (VOCs) after thermal oxidizer control, and unless approved by the Air Pollution Control Officer, the only phenolic treater resins which are permitted to be used in either treater are: Georgia-Pacific Flat Stock Resin 4113 and Georgia-Pacific Forming Resin 4126 or resins of equivalent composition, as determined by the Air Pollution Control Officer.	2.B.3.b.
PTO 26	Phenolic Treater Lines and RTO	26. Formica Corporation shall prepare and submit a succinct written analysis with the annual source test results confirming that the testing has demonstrated that the emission reductions are real and permanent on a continuous basis. To verify emission reductions claimed the District	3.F.5.

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Origin	Unit	Condition	TV Condition #
		may, in addition to the required source tests by California Air Resources Board and/or U.S. Environmental Protection Agency approved methods, require continuous monitoring, production records, fuel use records, or any other appropriate means.	
PTO 27	Facility	27. Prior to the registration and issuance of ERC Certificates) and prior to any deposit, withdrawal, or the transfer of Emission Reduction Credits, a report shall be made to the District detailing the amount of emissions for offsets purchased, by pollutant; the year the offset transaction occurred; and the total cost, by pollutant, of the offsets purchased, and other such information as may be required to perform the cost analysis required by Section 40709.5(e) of the California Health and Safety Code. This information shall be part of the public record.	6.F.4.
PTO 28	Phenolic Treater Lines and RTO	28. Prior to venting phenolic treaters lines or thermal oxidizer to atmosphere Formica shall obtain permission from the District.	2.B.6.e.
PTO 29	RTO	29. Exhaust air will be circulated through the oxidizer for a period of 15 minutes after treater stoppage prior to venting to atmosphere.	2.B.4.c.
PTO 30	RTO	30. Oxidizer isolation damper shall be used for catalyst bake out and for control of treaters for fire prevention only.	2.B.4.a.
PTO 33a	Facility	33. Emissions Limitations: a. No emissions are permitted, from any source, which are a nuisance per District Rule 205	3.B.
PTO 33b	Facility	33. Emissions Limitations: b. Stack emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, Visible Emissions.	3.A.
PTO 33c	RTO	33. Emissions Limitations: c. Air pollutant emissions from the regenerative thermal oxidizer shall not exceed the following rates: REGENERATIVE THERMAL OXIDIZER EMISSIONS POLLUTANT LBS/HR LBS/DAY LBS/QUARTER NOx 1.81 43.4 3,960 CO .38 9.0 830 PM10 .1 2.3 216 ROC 7.0 168 15,456 SO2 .0053 0.1 12	2.A.4.

Table 4
Formica Corporation
Streamlined Conditions

Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
PTO 24	24. Source testing shall be conducted using the methods and procedures approved by the District. Unless otherwise authorized in writing by the District, the methods shall be those used in establishing initial thermal oxidizer compliance under Authority to Construct 92-27.	<p>29. Source testing shall be conducted using the methods and procedures approved by the District. A pretest plan outlining the test methods and procedures shall be submitted for District approval at least 30 days prior to each test. Except as otherwise specified in District Rules and Regulations, testing methods for determining compliance with emission limits shall be:</p> <p>A. The appropriate methods adopted by the California Air Resources Board and cited in Title 17, California Code of Regulations, Division 3, Subchapter 8, Compliance with Non-vehicular Emission Standards; or</p> <p>B. The appropriate methods of 40 CFR part 50, Appendix M, Recommended Test Methods for State Implementation Plans; or</p> <p>C. Any appropriate method of 40 CFR part 60, Appendix A, Test Methods; or</p> <p>D. An alternative method following review and approval of that method by the Air Pollution Control Officer. Note: The Air Pollution Control Officer shall request the review of the alternate test methods by the U.S. Environmental Protection Agency and the California Air Resources Board.</p>	92-27 29 6.E.1.
92-27 28	28. Source testing to demonstrate compliance with permit conditions and all District rules and regulations shall be conducted within 90 days of initial start-up and on an annual basis thereafter, and whenever a resin other than those allowed by this permit is to be used.	16. Source testing to demonstrate a thermal oxidizer volatile organic compound control efficiency of no less than 98.5 % , an emission rate of no more than 7 pounds VOC per hour and 168 pounds VOC per day, shall be conducted annually, and whenever a resin other than those allowed by this permit is to be used. Source testing will be performed, and compliance with the hourly limit will be based, on three, consecutive one-hour test runs. Compliance with the daily emission	96-59 16 6.D.

Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
		limit will be based on the average hourly emission rate of the three one-hour test runs, multiplied by 24 (hours/day).	
95-20 4	4. The plant manager shall report any changes in operation schedule or process to the District immediately.	4. Pursuant to District Rule 502, New Source Review, Section 227, the plant manager shall report to the District immediately any changes in production rates or operation schedules, changes in operation methods or fuel characteristics, the addition to or removal of permitted equipment, and changes of any facilities or systems installed or used to achieve compliance with the District Rules and Regulations in addition to the terms and conditions of this Permit to Operate.	99-06 4 6.F.4.
92-27 3	3. Formica Corporation shall report any changes in operation or process not in conformance with this Authority to Construct to the District immediately.	4. Pursuant to District Rule 502, New Source Review, Section 227, the plant manager shall report to the District immediately any changes in production rates or operation schedules, changes in operation methods or fuel characteristics, the addition to or removal of permitted equipment, and changes of any facilities or systems installed or used to achieve compliance with the District Rules and Regulations in addition to the terms and conditions of this Permit to Operate.	99-06 4 6.F.4.
PTO 4	4. The plant manager shall report any changes in operation schedule or process to the District immediately	4. Pursuant to District Rule 502, New Source Review, Section 227, the plant manager shall report to the District immediately any changes in production rates or operation schedules, changes in operation methods or fuel characteristics, the addition to or removal of permitted equipment, and changes of any facilities or systems installed or used to achieve compliance with the District Rules and Regulations in addition to the terms and conditions of this Permit to Operate.	99-06 4 6.F.4.
96-59 4	4. Pursuant to District Rule 502, New Source Review, Section 227, the plant manager shall report to the District immediately any changes in production rates or operation schedules, changes in operation methods or fuel characteristics, the addition to or removal of permitted equipment, and	4. Pursuant to District Rule 502, New Source Review, Section 227, the plant manager shall report to the District immediately any changes in production rates or operation schedules, changes in operation methods or fuel characteristics, the addition to or removal of permitted	99-06 4 6.F.4.

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Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
	changes of any facilities or systems installed or used to achieve compliance with the District Rules and Regulations in addition to the terms and conditions of this Permit to Operate.	equipment, and changes of any facilities or systems installed or used to achieve compliance with the District Rules and Regulations in addition to the terms and conditions of this Permit to Operate.	
96-59 5	5. Revisions of this permit may be requested pursuant to District Rule 501, General Permit Requirements, Section 400.	5. Revisions of this permit may be requested pursuant to District Rule 501, General Permit Requirements, Section 400.	99-06 5 3.G.6.
96-59 7	7. Upon any change in control or ownership of facilities constructed, operated, or modified under authority of this permit, the requirements contained in this Permit to Operate shall be binding on all subsequent owners and operators. Notice of changes in ownership of permitted facilities shall be given to the District.	A change of ownership application must be filed and processed by the District prior to any change in control or ownership of facilities constructed, operated, or modified under authority of this permit.	99-06 7 3.G.5.
99-06 2	2. In the event of any violation of District Rules and Regulations plant manager shall cease operation of violating equipment and take action to end such violation.	1. In the event of any violation of District Rules and Regulations plant manager shall cease operation of violating equipment and take action to end such violation; except as provided for by District Rule 404.	PTO 1 3.F.2.
96-59 2	2. In the event of any violation of District Rules and Regulations plant manager shall cease operation of violating equipment and take action to end such violation.	1. In the event of any violation of District Rules and Regulations plant manager shall cease operation of violating equipment and take action to end such violation; except as provided for by District Rule 404.	PTO 1 3.F.2.
95-20 1	1. In the event of any violation of District Rules and Regulations plant manager shall cease operation of violating equipment and take action to end such violation.	1. In the event of any violation of District Rules and Regulations plant manager shall cease operation of violating equipment and take action to end such violation; except as provided for by District Rule 404.	PTO 1 3.F.2.
92-27 1	1. In the event of any violation of District Rules and Regulations, Formica Corporation shall cease operation of the violating equipment and take action to end such violation.	1. In the event of any violation of District Rules and Regulations plant manager shall cease operation of violating equipment and take action to end such violation; except as provided for by District Rule 404.	PTO 1 3.F.2.
92-27 7	7. All equipment, facilities and systems installed or used to achieve compliance with the terms and conditions of this Authority to	14. The equipment must be properly maintained and kept in good operating conditions at all times.	PTO 14 3.G.3.

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Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
	Construct shall be maintained in good working order and be operated as efficiently as possible to minimize air pollutant emissions.		
95-20 8	8. The permit(s) do not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, of the Health and Safety Code of the State of California or the Rules and Regulations of the Air Pollution Control District. The permit(s) cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other governmental agencies.	15. The permit(s) do not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, of the Health and Safety Code of the State of California or the Rules and Regulations of the Air Pollution Control District. The permit(s) cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other governmental agencies.	PTO 15 3.G.9.
95-20 11	11. The phenolic treaters shall at no time be operated unless the thermal oxidizer is fully operational or in accordance with Rule 404, Upset Conditions. Breakdown or Scheduled Maintenance, or a variance granted by the District Hearing Board.	18. The phenolic treaters shall at no time be operated unless the thermal oxidizer is fully operational or in accordance with Rule 404, Upset Conditions. Breakdown or Scheduled Maintenance, or a variance granted by the District Hearing Board.	PTO 18 2.B.3.b.
96-59 8	8. The phenolic treaters shall at no time be operated unless the thermal oxidizer is fully operational or in accordance with Rule 404, Upset Conditions. Breakdown or Scheduled Maintenance, or a variance granted by the District Hearing Board.	18. The phenolic treaters shall at no time be operated unless the thermal oxidizer is fully operational or in accordance with Rule 404, Upset Conditions. Breakdown or Scheduled Maintenance, or a variance granted by the District Hearing Board.	PTO 18 2.B.3.b.
92-27 14	14. The phenolic treaters shall at no time be operated unless the thermal oxidizer is fully operational or in accordance with Rule 404 or a variance granted by the District Hearing Board.	18. The phenolic treaters shall at no time be operated unless the thermal oxidizer is fully operational or in accordance with Rule 404, Upset Conditions. Breakdown or Scheduled Maintenance, or a variance granted by the District Hearing Board.	PTO 18 2.B.3.b.
95-20 12	12. The exceeding of an emission limitation shall be reported to the District immediately. The District may require a user within the District of offsets which are dependent upon compliance with the emission limit(s) for permanency, to obtain valid offsets or curtail operations to the extent that the credited reductions used as offsets are deemed to be no longer valid, pursuant to Rule 502, New Source Review.	19. The exceeding of an emission limitation shall be reported to the District immediately. The District may require a user within the District of offsets which are dependent upon compliance with the emission limit(s) for permanency, to obtain valid offsets or curtail operations to the extent that the credited reductions used as offsets are deemed to be no longer valid, pursuant to Rule 502, New	PTO 19 6.F.1.a.

Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
		Source Review.	
96-59 3	3. The plant manager shall notify the District (per Rule 404) of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by District Rules and Regulations.	2. The plant manager shall notify the District (per Rule 404) of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by the District Rules and Regulations.	PTO 2 3.F.1.
99-06 3	3. The plant manager shall notify the District (per Rule 404) of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by District Rules and Regulations.	2. The plant manager shall notify the District (per Rule 404) of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by the District Rules and Regulations.	PTO 2 3.F.1.
92-27 2	2. Formica Corporation shall notify the District (per Rule 404, "Upset/Breakdown") of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by District Rules and Regulations or conditions of this permit.	2. The plant manager shall notify the District (per Rule 404) of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by the District Rules and Regulations.	PTO 2 3.F.1.
95-20 2	2. The plant manager shall notify the District (per Rule 404) of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by the District Rules and Regulations.	2. The plant manager shall notify the District (per Rule 404) of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by the District Rules and Regulations.	PTO 2 3.F.1.
92-27 16	16. The thermal oxidizer shall be preheated to a minimum temperature of 1500 F prior to operating the treaters. The minimum temperature of 1500 F, or such temperature as has been demonstrated to attain at least 98.5 % hydrocarbon destruction and as approved by the Air Pollution Control Officer, shall be maintained in the oxidizer at all times during the laminating process.	20. The thermal oxidizer temperature shall be maintained at a minimum level necessary to ensure that the specified minimum destruction efficiency is achieved, at all times during operations of either treater.	PTO 20 2.B.4.b.
95-20 13	13. The thermal oxidizer temperature shall be maintained at a minimum level necessary to ensure that the specified minimum destruction efficiency is achieved, at all times during operations of either treater.	20. The thermal oxidizer temperature shall be maintained at a minimum level necessary to ensure that the specified minimum destruction efficiency is achieved, at all times during operations of either treater.	PTO 20 2.B.4.b.
95-20 14	14. Formica Corporation shall conduct operations and monitoring in accordance with the Operating Compliance Plan, to	21. Formica Corporation shall conduct operations and monitoring in accordance with the Operating Compliance Plan, to	PTO 21 6.B.1.

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Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
	assure that the design characteristics or equipment will be properly maintained (or that the operational conditions will be properly performed) so as to continuously achieve the minimum degree of VOC control of 98.5 percent. Formica Corporation shall amend the Operating Compliance Plan to reflect and changes in operations, maintenance, or monitoring affecting the Operations Compliance Plan. These amendments shall be subject to District approval.	assure that the design characteristics or equipment will be properly maintained (or that the operational conditions will be properly performed) so as to continuously achieve the minimum degree of VOC control of 98.5 percent. Formica Corporation shall amend the Operating Compliance Plan to reflect and changes in operations, maintenance, or monitoring affecting the Operations Compliance Plan. These amendments shall be subject to District approval.	
96-59 9	9. Formica Corporation shall conduct operations and monitoring in accordance with the Operating Compliance Plan, to assure that the design characteristics or equipment will be properly maintained (or that the operational conditions will be properly performed) so as to continuously achieve the minimum degree of VOC control of 98.5 percent.	21. Formica Corporation shall conduct operations and monitoring in accordance with the Operating Compliance Plan, to assure that the design characteristics or equipment will be properly maintained (or that the operational conditions will be properly performed) so as to continuously achieve the minimum degree of VOC control of 98.5 percent. Formica Corporation shall amend the Operating Compliance Plan to reflect and changes in operations, maintenance, or monitoring affecting the Operations Compliance Plan. These amendments shall be subject to District approval.	PTO 21 6.B.1.
92-27 26	26. Unless demonstrated by testing or engineering evaluation to emit lower or equal quantities of volatile organic compounds (VOCs) after thermal oxidizer control, and unless approved by the Air Pollution Control Officer, the only phenolic treater resins which are permitted to be used in either treater are: Georgia-Pacific Flat Stock Resin 4113 and Georgia-Pacific Forming Resin 4126 or resins of equivalent composition.	22. Unless demonstrated by testing or an engineering evaluation to emit lower or equal quantities of volatile organic compounds (VOCs) after thermal oxidizer control, and unless approved by the Air Pollution Control Officer, the only phenolic treater resins which are permitted to be used in either treater are: Georgia-Pacific Flat Stock Resin 4113 and Georgia-Pacific Forming Resin 4126 or resins of equivalent composition, as determined by the Air Pollution Control Officer.	PTO 22 3.B.3.a.
95-20 15	15. Unless demonstrated by testing or an engineering evaluation to emit lower or equal quantities of volatile organic compounds (VOCs) after thermal oxidizer control, and unless approved by the Air Pollution Control Officer, the only phenolic treater resins which are permitted to be used	22. Unless demonstrated by testing or an engineering evaluation to emit lower or equal quantities of volatile organic compounds (VOCs) after thermal oxidizer control, and unless approved by the Air Pollution Control Officer, the only phenolic treater resins which are	PTO 22 3.B.3.a.

Table 4 - Formica - Page 37 of 49

Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
	in either treater are: Georgia-Pacific Flat Stock Resin 4113 and Georgia-Pacific Forming Resin 4126 or resins of equivalent composition, as determined by the Air Pollution Control Officer.	permitted to be used in either treater are: Georgia-Pacific Flat Stock Resin 4113 and Georgia-Pacific Forming Resin 4126 or resins of equivalent composition, as determined by the Air Pollution Control Officer.	
92-27 31	<p>31. Excess Emission Reductions</p> <p>A. The VOC emission reductions of 498 tons per year will be considered real, permanent, and enforceable upon source testing of the thermal oxidizer to confirm that the conditions of this Authority to Construct have been achieved; and</p> <p>B. The VOC emission reductions have been quantified in conformance with applicable laws and regulations; and</p> <p>C. The VOC emission reductions are not required by federal, state, or District permits, agreements, orders, rules or regulations; are not required by the approved State Implementation Plan; and have not been used to meet "reasonable further progress"; and</p> <p>D. The excess VOC emission reductions are available onsite for use by Formica in accordance with District Rule 508 or for sale offsite subject to District rules and rules of any other district having jurisdiction over the facility proposing emission increases at the time of the transaction; and</p> <p>E. Conversion of the excess VOC emission reductions to banked Emission Reduction Credits shall be subject to District rules in effect at the time the conversion is made.</p>	<p>25. The VOC actual emission reductions of 497.31 tons per year, will be considered real, permanent, and enforceable upon demonstration by source testing of the thermal oxidizer to confirm that the conditions of certification have been verified, and annually thereafter. Of these actual emission reductions, 473.63 tons VOC per year are deemed to be certifiable upon verification: 243,461 lbs/1st quarter; 237,570 lbs/2nd quarter; 237,410 lbs/3rd quarter; and 228,815 lbs/4th quarter.</p>	PTO 25 3.J.
95-20 18	18. Prior to venting the thermal oxidizer to atmosphere Formica shall obtain permission from the District.	28. Prior to venting phenolic treaters lines or thermal oxidizer to atmosphere Formica shall obtain permission from the District.	PTO 28 2.B.6.e.
96-59 1	1. Operation of this equipment must be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless	3. Operation of this equipment must be conducted in compliance with all data and specifications submitted with the application under which this permit is	PTO 3 3.G.10.

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Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
	otherwise prescribed by conditions. Any operation of equipment or discharge of emissions to the atmosphere not identified by application submittals made to the District or exceeding the limits of the operation pursuant to which this permit is granted, shall be deemed a violation.	issued unless otherwise noted below.	
95-20 3	3. Operation of this equipment must be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.	3. Operation of this equipment must be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.	PTO 3 3.G.10.
92-27 6	6. Operation of permitted equipment shall be limited to the maximum rates and schedules of operation, and the specified process materials of approved plans and specifications submitted to the District in application submittals unless otherwise prescribed in the conditions.	3. Operation of this equipment must be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.	PTO 3 3.G.10.
99-06 1	1. Operation of this equipment must be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise prescribed by conditions. Any operation of equipment or discharge of emissions to the atmosphere not identified by application submittals made to the District or exceeding the limits of the operation pursuant to which this permit is granted, shall be deemed a violation	3. Operation of this equipment must be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.	PTO 3 3.G.10.
95-20 20	20. Oxidizer isolation damper shall be used for catalyst bake out and for control of treaters for fire prevention only.	30. Oxidizer isolation damper shall be used for catalyst bake out and for control of treaters for fire prevention only.	PTO 30 2.B.4.a.
96-59 12	12. Emissions Limitations: a. No emissions are permitted, from any source, which are a nuisance per District Rule 205.	33. Emissions Limitations: a. No emissions are permitted, from any source, which are a nuisance per District Rule 205	PTO 33a 3.B.
99-06 13.B	13. Emission Limitations B. No emissions are permitted, from any source, which are a nuisance per District Rule 205, Nuisance.	33. Emissions Limitations: a. No emissions are permitted, from any source, which are a nuisance per District Rule 205	PTO 33a 3.B.
92-27	11. Emissions Limitations:	33. Emissions Limitations:	PTO 33a

Table 4 - Formica - Page 39 of 49

Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
11	A. No emissions are permitted, from any source, which are a nuisance per District Rule 205, Nuisance.	a. No emissions are permitted, from any source, which are a nuisance per District Rule 205	3.B.
95-20 21	21. Emissions Limitations: A. No emissions are permitted, from any source, which are a nuisance per District Rule 205.	33. Emissions Limitations: a. No emissions are permitted, from any source, which are a nuisance per District Rule 205	PTO 33a 3.B.
95-20 21.B	21. Emissions Limitations: B. Stack emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, Visible Emissions.	33. Emissions Limitations: b. Stack emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, Visible Emissions.	PTO 33b 3.A.
99-06 13.A	13. Emission Limitations A. An emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited.	33. Emissions Limitations: b. Stack emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, Visible Emissions.	PTO 33b 3.A.
92-27 11.B	11. Emissions Limitations: B. An emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, Visible Emissions.	33. Emissions Limitations: b. Stack emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, Visible Emissions.	PTO 33b 3.A.
96-59 12.b	12. Emissions Limitations: b. Stack emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, Visible Emission's.	33. Emissions Limitations: b. Stack emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, Visible Emissions.	PTO 33b 3.A.

Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV																								
92-27 11.G	<p>11. Emissions Limitations:</p> <p>G. Phenolic Treater and Thermal Oxidizer total VOC emissions shall not exceed 30.6 tons in any one year.</p>	<p>33. Emissions Limitations:</p> <p>c. Air pollutant emissions from the regenerative thermal oxidizer shall not exceed the following rates:</p> <p>REGENERATIVE THERMAL OXIDIZER EMISSIONS</p> <table> <tr> <td>POLLUTANT</td> <td>Lbs/hr</td> <td>Lbs/day</td> <td>Lbs/Qtr</td> </tr> <tr> <td>NOx</td> <td>1.81</td> <td>43.4</td> <td>3,960</td> </tr> <tr> <td>CO</td> <td>.38</td> <td>9.0</td> <td>830</td> </tr> <tr> <td>PM10</td> <td>.1</td> <td>2.3</td> <td>216</td> </tr> <tr> <td>ROC</td> <td>7.0</td> <td>168.0</td> <td>15,456</td> </tr> <tr> <td>S02</td> <td>.0053</td> <td>0.1</td> <td>12</td> </tr> </table>	POLLUTANT	Lbs/hr	Lbs/day	Lbs/Qtr	NOx	1.81	43.4	3,960	CO	.38	9.0	830	PM10	.1	2.3	216	ROC	7.0	168.0	15,456	S02	.0053	0.1	12	PTO 33c 2.A.4.
POLLUTANT	Lbs/hr	Lbs/day	Lbs/Qtr																								
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PM10	.1	2.3	216																								
ROC	7.0	168.0	15,456																								
S02	.0053	0.1	12																								
92-27 11.F	<p>11. Emissions Limitations:</p> <p>F. Thermal Oxidizer total oxides of nitrogen (NOx) emissions shall not exceed 59 pounds in any one day, nor more than 2.67 tons per quarter, nor more than 2.5 pounds per hour.</p>	<p>33. Emissions Limitations:</p> <p>c. Air pollutant emissions from the regenerative thermal oxidizer shall not exceed the following rates:</p> <p>REGENERATIVE THERMAL OXIDIZER EMISSIONS</p> <table> <tr> <td>POLLUTANT</td> <td>Lbs/hr</td> <td>Lbs/day</td> <td>Lbs/Qtr</td> </tr> <tr> <td>NOx</td> <td>1.81</td> <td>43.4</td> <td>3,960</td> </tr> <tr> <td>CO</td> <td>.38</td> <td>9.0</td> <td>830</td> </tr> <tr> <td>PM10</td> <td>.1</td> <td>2.3</td> <td>216</td> </tr> <tr> <td>ROC</td> <td>7.0</td> <td>168.0</td> <td>15,456</td> </tr> <tr> <td>S02</td> <td>.0053</td> <td>0.1</td> <td>12</td> </tr> </table>	POLLUTANT	Lbs/hr	Lbs/day	Lbs/Qtr	NOx	1.81	43.4	3,960	CO	.38	9.0	830	PM10	.1	2.3	216	ROC	7.0	168.0	15,456	S02	.0053	0.1	12	PTO 33c 2.A.4.
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PM10	.1	2.3	216																								
ROC	7.0	168.0	15,456																								
S02	.0053	0.1	12																								
95-20 9	<p>9. Phenolic Treater and Thermal Oxidizer total volatile organic compound (VOC) emissions shall not exceed 15,120 lbs January through March (1st quarter); 15,288 lbs April through June (2nd quarter); 15,456 lbs July through September (3rd quarter); and 15,456 lbs October through December (4th quarter)</p>	<p>33. Emissions Limitations:</p> <p>c. Air pollutant emissions from the regenerative thermal oxidizer shall not exceed the following rates:</p> <p>REGENERATIVE THERMAL OXIDIZER EMISSIONS</p> <table> <tr> <td>POLLUTANT</td> <td>Lbs/hr</td> <td>Lbs/day</td> <td>Lbs/Qtr</td> </tr> <tr> <td>NOx</td> <td>1.81</td> <td>43.4</td> <td>3,960</td> </tr> <tr> <td>CO</td> <td>.38</td> <td>9.0</td> <td>830</td> </tr> <tr> <td>PM10</td> <td>.1</td> <td>2.3</td> <td>216</td> </tr> <tr> <td>ROC</td> <td>7.0</td> <td>168.0</td> <td>15,456</td> </tr> <tr> <td>S02</td> <td>.0053</td> <td>0.1</td> <td>12</td> </tr> </table>	POLLUTANT	Lbs/hr	Lbs/day	Lbs/Qtr	NOx	1.81	43.4	3,960	CO	.38	9.0	830	PM10	.1	2.3	216	ROC	7.0	168.0	15,456	S02	.0053	0.1	12	PTO 33c 2.A.4.
POLLUTANT	Lbs/hr	Lbs/day	Lbs/Qtr																								
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PM10	.1	2.3	216																								
ROC	7.0	168.0	15,456																								
S02	.0053	0.1	12																								
92-27 11.I	<p>11. Emissions Limitations:</p> <p>I. Thermal Oxidizer total sulfur oxide (SOx) emissions shall not exceed 0.6 pounds in any one day, nor more than 0.03 tons per quarter,</p>	<p>33. Emissions Limitations:</p> <p>c. Air pollutant emissions from the regenerative thermal oxidizer shall not exceed the following rates:</p>	PTO 33c 2.A.4.																								

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Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
	nor more than 0.03 pounds per hour.	REGENERATIVE THERMAL OXIDIZER EMISSIONS POLLUTANT Lbs/hr Lbs/day Lbs/Qtr NOx 1.81 43.4 3,960 CO .38 9.0 830 PM10 .1 2.3 216 ROC 7.0 168.0 15,456 S02 .0053 0.1 12	
92-27 11.J	11. Emissions Limitations: J. Thermal Oxidizer total particulate matter emissions, less than or equal to a nominal aerodynamic diameter of 10 microns in size, (PM10) shall not exceed 4.8 pounds in any one day, nor more than 0.22 tons per quarter, nor more than 0.2 pounds per hour.	33. Emissions Limitations: c. Air pollutant emissions from the regenerative thermal oxidizer shall not exceed the following rates: REGENERATIVE THERMAL OXIDIZER EMISSIONS POLLUTANT Lbs/hr Lbs/day Lbs/Qtr NOx 1.81 43.4 3,960 CO .38 9.0 830 PM10 .1 2.3 216 ROC 7.0 168.0 15,456 S02 .0053 0.1 12	PTO 33c 2.A.4.
95-20 10	10. Phenolic Treater and Thermal Oxidizer total VOC emissions shall not exceed 30.66 tons in any one year.	33. Emissions Limitations: c. Air pollutant emissions from the regenerative thermal oxidizer shall not exceed the following rates: REGENERATIVE THERMAL OXIDIZER EMISSIONS POLLUTANT Lbs/hr Lbs/day Lbs/Qtr NOx 1.81 43.4 3,960 CO .38 9.0 830 PM10 .1 2.3 216 ROC 7.0 168.0 15,456 S02 .0053 0.1 12	PTO 33c 2.A.4.
92-27 11.H	11. Emissions Limitations: H. Thermal Oxidizer total carbon monoxide (CO) emissions shall not exceed 33.2 pounds in any one day, nor more than 1.53 tons per quarter, nor more than 8.3 pounds per hour.	33. Emissions Limitations: c. Air pollutant emissions from the regenerative thermal oxidizer shall not exceed the following rates: REGENERATIVE THERMAL OXIDIZER EMISSIONS POLLUTANT Lbs/hr Lbs/day Lbs/Qtr NOx 1.81 43.4 3,960	PTO 33c 2.A.4.

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Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
		CO .38 9.0 830 PM10 .1 2.3 216 ROC 7.0 168.0 15,456 S02 .0053 0.1 12	
92-27 11.E	11. Emissions Limitations: E. Phenolic Treater and Thermal Oxidizer total volatile organic compound (VOC) emissions shall not exceed 168 pounds in any one day, nor more than 7.65 tons per quarter, nor more than 7.0 pounds per hour.	33. Emissions Limitations: c. Air pollutant emissions from the regenerative thermal oxidizer shall not exceed the following rates: REGENERATIVE THERMAL OXIDIZER EMISSIONS POLLUTANT Lbs/hr Lbs/day Lbs/Qtr NOx 1.81 43.4 3,960 CO .38 9.0 830 PM10 .1 2.3 216 ROC 7.0 168.0 15,456 S02 .0053 0.1 12	PTO 33c 2.A.4.
PTO 17	17. Phenolic Treater and Thermal Oxidizer total VOC emissions shall not exceed 30.66 tons in any one year.	33. Emissions Limitations: c. Air pollutant emissions from the regenerative thermal oxidizer shall not exceed the following rates: REGENERATIVE THERMAL OXIDIZER EMISSIONS POLLUTANT Lbs/hr Lbs/day Lbs/Qtr NOx 1.81 43.4 3,960 CO .38 9.0 830 PM10 .1 2.3 216 ROC 7.0 168.0 15,456 S02 .0053 0.1 12	PTO 33c 2.A.4.
96-59 12.c	12. Emissions Limitations: c. Air pollutant emissions from the regenerative thermal oxidizer after installation of the burners and duct heater (AC-95-20) shall not exceed the following rates: Regenerative Thermal Oxidizer Emissions Pollutant Lbs/hr Lbs/day Lbs/quarter Tons/year NOX 1.81 43.4 3,960 7.92 CO .38 9.0 830 1.6 PM10 .1 2.3 216 0.4 ROC 7.0 168.0 15,456 30.7	33. Emissions Limitations: c. Air pollutant emissions from the regenerative thermal oxidizer shall not exceed the following rates: Regenerative Thermal Oxidizer Emissions POLLUTANT Lbs/hr Lbs/day Lbs/Qtr NOx 1.81 43.4 3,960 CO .38 9.0 830 PM10 .1 2.3 216 ROC 7.0 168.0 15,456 S02 .0053 0.1 12	PTO 33c 2.A.4.

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Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
	S02 .0053 0.1 12 .02		
95-20 5	5. The plant manager shall develop a maintenance program for equipment listed herein to preclude a violation of the California Health and Safety Code and District Rules and Regulations.	6. The plant manager shall develop a maintenance program for equipment listed herein to preclude a violation of the California Health and Safety Code and District Rules and Regulations.	PTO 6 3.G.8.
95-20 6	6. A log book or other record detailing the performance and date of preventive maintenance, corrective maintenance, and inspections, as well as reporting breakdowns (per District Rule 404), shall be established and maintained. This log or record shall be made available to the District's inspector upon request:	7. A log book or other record detailing the performance and date of preventive maintenance, corrective maintenance, and inspections, as well as reporting breakdowns (per District Rule 404), shall be established and maintained. This log or record shall be made available to the District's inspector upon request.	PTO 7 6.C.4.
92-27 4	4. A log book or other record detailing the performance and date of preventive maintenance, corrective maintenance, and inspections, as well as reporting breakdowns (per District Rule 404), shall be established and maintained. This log or record shall be made available to the District's inspector upon request.	7. A log book or other record detailing the performance and date of preventive maintenance, corrective maintenance, and inspections, as well as reporting breakdowns (per District Rule 404), shall be established and maintained. This log or record shall be made available to the District's inspector upon request.	PTO 7 6.C.4.
99-06 6	6. An Authority to Construct application shall be filed with the District prior to the modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required pursuant to Health and Safety Code, Section 42300, and District Rule -501, General Permit Requirements, Section 300.	8. An Authority to Construct application shall be filed with the District prior to the modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required pursuant to Health and Safety Code, Section 42300, and District Rule 501, Permits Required.	PTO 8 3.G.1.
92-27 9	9. No limiting condition of this permit shall be exceeded without prior application for, and the subsequent granting of, a permit modification pursuant to District Rule 501, General Permit Requirements. No limiting condition or any emission limitation established by the Rules and Regulations of the District shall be exceeded unless specifically allowed by a granted variance or as authorized per District Rule 404 under an upset or breakdown condition.	8. An Authority to Construct application shall be filed with the District prior to the modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required pursuant to Health and Safety Code, Section 42300, and District Rule 501, Permits Required.	PTO 8 3.G.1.
92-27 5	5. An Authority to Construct application shall be filed with the District prior to the	8. An Authority to Construct application shall be filed with the District prior to the	PTO 8 3.G.1.

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Origin	Condition Streamlined	Proposed Title V Permit Condition	Origin/ TV
	modification or replacement of any equipment for which a permit has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required pursuant to Health and Safety Code, Section 42300, and District Rule 501, General Permit Requirements.	modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required pursuant to Health and Safety Code, Section 42300, and District Rule 501, Permits Required.	
95-20 7	7. An Authority to Construct application shall be filed with the District prior to the modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required pursuant to Health and Safety Code, Section 42300, and District Rule 501, Permits Required.	8. An Authority to Construct application shall be filed with the District prior to the modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required pursuant to Health and Safety Code, Section 42300, and District Rule 501, Permits Required.	PTO 8 Modification
96-59 6	6. An Authority to Construct application shall be filed with the District prior to the modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required pursuant to Health and Safety Code, Section 42300, and District Rule 501, General , Permit Requirements, Section 300.	8. An Authority to Construct application shall be filed with the District prior to the modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required pursuant to Health and Safety Code, Section 42300, and District Rule 501, Permits Required.	PTO 8 Modification
99-06 8	8. Compliance of the permitted facility is required with the provisions of the "Air Toxics 'Hot Spots' Information and Assessment Act" of 1987 (Health and Safety Code Sections 44300 et seq.).	9. Compliance of the permitted facility is required with the provisions of the "Air Toxics 'Hot Spots' Information and Assessment Act" of 1987 (Health and Safety Code Sections 44300 et seq.).	PTO 9 3.G.4.
92-27 10	10. Formica Corporation is responsible for compliance of the permitted facility with the provisions of the "Air Toxics' Hot Spots' Information and Assessment Act" of 1987 (Health and Safety Code Sections 44300 et seq.).	9. Compliance of the permitted facility is required with the provisions of the "Air Toxics 'Hot Spots' Information and Assessment Act" of 1987 (Health and Safety Code Sections 44300 et seq.).	PTO 9 3.G.4.

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Table 5
Formica Corporation
Obsolete Conditions

Origin	Condition	Basis
92-27 11	11. Emissions Limitations: L. Thermal Oxidizer burners shall be low NOX burners. Formica Corporation shall submit burner and emissions information, prior to thermal oxidizer installation, for the evaluation of the burners for compliance with Best Available Control Technology criteria.	Information submitted
92-27 13	13. This permit is issued as an Authority to Construct and Temporary Permit to Operate pursuant to Section 42301.1 of the California Health and Safety Code. The equipment and process permitted herein may be operated in compliance with Section 41700 permit conditions, and District Rules and Regulations.	Issued a PTO
92-27 17	17. The thermal oxidizer, to the maximum extent feasible, will be designed such that the incoming hydrocarbon concentration will be sufficient to sustain combustion. Both Auxiliary Burners and Pilot Burners will be fired solely by natural gas.	Equipment installed
92-27 23	23. A plan outlining the method by which the process rate will be monitored shall be submitted to the District for approval prior to the issuance of a permit to operate.	Plan submitted
92-27 24	24. Formica Corporation shall submit an Operating Compliance Plan which will assure that the design characteristics or equipment will be properly maintained (or that the operational conditions will be properly performed) so as to continuously achieve the minimum degree of VOC control of 98.5 percent. A. The Operating Compliance Plan shall include process limitations, corresponding to emissions limits enforceable by continuous process monitoring devices, and a description of the process monitoring program and indicators to be provided. Such limitations shall be expressed in a manner consistent with the emission testing and monitoring procedures used, such as process rates, material specifications, or exhaust concentration limitations. B. The plan shall include the frequency and methods of calibrating the process monitoring system and verifying the emission factors. C. The plan shall identify the methods by which Formica will verify that the treaters, ducting, and thermal oxidizer do not produce fugitive losses of VOCs (i.e. they operate under negative pressure) during normal operation. D. Upon review and approval by the District, the Operating Compliance Plan shall become a condition of this Authority to Construct.	Plan submitted
92-27 27	27. Provisions should be made for the sampling of both the control system inlet and exhaust (i.e. the installation of test ports, of approved configuration).	Equipment installed

Origin	Condition	Basis
92-27 30	30. Formica Corporation shall provide the District with the updated monitoring and control equipment specifications when the selection of this equipment is finalized.	Equipment finalized
96-59 12d	12. Emissions Limitations: d. The emissions limits listed above may be adjusted by the District following review of the source tests.	Source tests reviewed
99-06 10a	10. Operation and Maintenance Plan An Operation and Maintenance Plan shall be submitted to the District by September 30, 1999. The plan shall specify: A. Operation and maintenance procedures that will demonstrate continuous operation of the emission control system during emission-producing operations. This plan should indicate acceptable settings for the flue gas recirculation valves. B. Records that must be kept to document the operation and maintenance procedures	Plan submitted
99-06 11a	11. Performance Test Requirements: A. An initial compliance test shall be conducted by no later than September 30, 1999.	Initial test performed
PTO 5	5. FORM-76-01, 75-02: #5 fuel oil shall not exceed a sulfur content of 0.8% by weight or a firing rate of 283 GPH.	Oil burning capability has been removed
PTO 25	25. The VOC actual emission reductions of 497.31 tons per year, will be considered real, permanent, and enforceable upon demonstration by source testing of the thermal oxidizer to confirm that the conditions of certification have been verified, and annually thereafter. Of these actual emission reductions, 473.63 tons VOC per year are deemed to be certifiable upon verification: 243,461 lbs/1st quarter; 237,570 lbs/2nd quarter; 237,410 lbs/3rd quarter; and 228,815 lbs/4th quarter.	Limits on the quantity of resin applied, the minimum VOC control efficiency of the RO, and quarterly VOC emission limits ensure that reductions are permanent
PTO 31	31. After January 1,1995, the subsequent burning of waste, in the Form-82-01 Waste Incinerator is to be authorized and witnessed by the District. A source test for criteria pollutants for the incinerator no later than 60 days from the authorized and witnessed date per mutual settlement agreement #NOV 1008.	Authorized and witnessed
PTO 32	32. The Formica Corporation surrenders operational use of the melamine storage permit Form-82-01.	Permit surrendered

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Table 6
Formica Corporation
Summary of Applicable Federal Requirements

Section Description	Applicable	Basis	Condition #
1. 205.1 Title I requirements: a. New Source Review requirements in the State Implementation Plan approved by the US Environmental Protection Agency and the terms and conditions of the preconstruction permit issued pursuant to an approved New Source Review rule;	Y	Existing District permit conditions	Several conditions in Sections 2, 3 and 4.
b. Prevention of Significant Deterioration (PSD) requirements and the terms and conditions of the PSD permit (40 CFR Part 52);	N	No applicable requirements identified	N/A
c. New Source Performance Standards (40 CFR Part 60);	N	No applicable standards identified	N/A
d. National Ambient Air Quality Standards, increments, and visibility requirements as they apply to portable sources required to obtain a permit pursuant to Section 504(e) of the Clean Air Act;	N	Formica does not operate portable sources	N/A
e. National Emissions Standards for Hazardous Air Pollutants (40 CFR Part 61);	Y	Standard terms for demolition or construction projects that may emit asbestos	Section 3 condition 3.L.2.
f. Maximum Achievable Control Technology or Generally Available Control Technology Standards (40 CFR Part 63);	N	No applicable standards or requirements identified.	N/A
g. Risk Management Plans and plan preparation and registration requirements (Section 112(r) of the Clean Air Act);	Y	Standard term requiring a RMP if subject	Section 3, condition 3.L.2.
h. Solid Waste Incineration requirements (Sections 111 or 129 of the Clean Air Act);	N	Formica does not operate a solid waste incinerator	N/A
i. Consumer and Commercial	N	No applicable	N/A

Section Description	Applicable	Basis	Condition #
Product requirements (Section 183 of the Clean Air Act);		requirements identified	
j. Tank Vessel requirements (Section 183 of the Clean Air Act);	N	Formica does not operate tank vessels	N/A
k. District prohibitory rules that are approved into the State Implementation Plan;	Y	See District SIP rule review.	Several conditions in sections 2, 3, and 6
l. Standards or regulations promulgated pursuant to a Federal Implementation Plan; and	N	No applicable standards or regulations identified.	N/A
m. Enhanced Monitoring and Compliance Certification requirements (Section 114(a)(3) of the Clean Air Act).	N	No applicable requirements identified.	N/A
2. 205.2 Title III, Section 328 (Outer Continental Shelf) requirements of the Clean Air Act (40 CFR Part 55);	N	Formica does not operate on the Outer Continental Shelf.	N/A
3. 205.3 Title IV (Acid Deposition Control) requirements of the Clean Air Act (40 CFR Parts 72, 73, 75, 76, 77, 78 and regulations implementing Sections 407 and 410 of the Clean Air Act);	N	Formica does not operate a subject utility unit.	N/A
4. 205.4 Title VI (Stratospheric Ozone Protection) requirements of the Clean Air Act (40 CFR Part 82); and	Y	Standard term requiring certified technicians for projects involving ozone depleting substances	Section 3 condition 3.L.1.
5. 205.5 Monitoring and Analysis requirements (Section 504(b) of the Clean Air Act).	N	No applicable standards or requirements identified.	N/A

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